



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MAA/LB/CJN  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 12, 2024

By Email and ECF

Mark D. Hopson  
Michael A. Levy  
Douglas A. Axel  
Melissa Colon-Bosolet  
Sidley Austin LLP

David Bitkower  
Matthew S. Hellman  
Matthew D. Cipolla  
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Records from a social media company.	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0122414116 - DOJ_HUAWEI_A_0122414119
Records from an intergovernmental committee.	Discovery Material ("DM")	DOJ_HUAWEI_A_0122414120 - DOJ_HUAWEI_A_0122414195
Records from a financial institution.	DM	DOJ_HUAWEI_A_0122414196 - DOJ_HUAWEI_A_0122414200
Records from a social media company.	DM	DOJ_HUAWEI_A_0122414201 - DOJ_HUAWEI_A_0122414482
Records from an electronic communication provider.	DM	DOJ_HUAWEI_A_0122414483 - DOJ_HUAWEI_A_0122426911
Records from IranTalent.com.	DM	DOJ_HUAWEI_A_0122426912 - DOJ_HUAWEI_A_0122427056
Records from a recruiting company.	DM	DOJ_HUAWEI_A_0122427057 - DOJ_HUAWEI_A_0122427058

Very truly yours,

BREON PEACE  
United States Attorney  
Eastern District of New York

By: /s/ Meredith A. Arfa  
Alexander A. Solomon  
Meredith A. Arfa  
Robert Pollack  
Assistant United States Attorneys  
(718) 254-7000

MARGARET A. MOESER  
Acting Chief, Money Laundering and Asset  
Recovery Section, Criminal Division  
U.S. Department of Justice

By: /s/ Laura Billings  
Laura Billings  
Jasmin Salehi Fashami  
Taylor Stout  
Trial Attorneys

JENNIFER KENNEDY GELLIE  
Acting Chief, Counterintelligence and  
Export Control Section  
National Security Division, U.S. Department  
of Justice

By: /s/ David Lim  
David Lim  
Christian Nauvel  
Yifei Zheng  
Garrett Coyle  
Trial Attorneys